

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID SIDOO et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED-TO MOTION FOR LEAVE
TO FILE OPPOSITION BRIEF (TO USC'S MOTION TO QUASH)
UNDER SEAL**

The University of Southern California has moved to quash two pretrial subpoenas that defendant John Wilson sought and obtained ex parte through sealed submissions.¹ The purpose of the ex parte proceedings on Wilson's subpoena requests was to preserve the confidentiality of Wilson's defense strategy and work product, in accordance with the Sixth Amendment's guarantees of effective counsel and compulsory process. *See United States v. Diamont*, No. 05-cr-10154 (D. Mass. Nov. 22, 2005). In order to continue to protect these values, the Court granted USC leave to file its motion to quash papers under seal. *See* July 2, 2020 Electronic Order (ECF No. 1356). For the same reason, Wilson hereby moves for leave to file his opposition brief and exhibits under seal as well. Wilson will serve a copy of the brief and exhibits on USC. USC assents to this Motion.

¹ The motions for the subpoenas are ECF Nos. 920, 1089. The motion to quash is ECF No. 1357.

Respectfully submitted:

Counsel to John Wilson:

/s/ Michael Kendall

Michael Kendall (BBO # 544866)
Yakov Malkiel (BBO # 689137)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
(617) 979-9310
michael.kendall@whitecase.com
yakov.malkiel@whitecase.com

Andrew E. Tomback (pro hac vice)
MCLAUGHLIN & STERN, LLP
260 Madison Avenue
New York, NY 10016
(212) 448-1100
atomback@mclaughlinstern.com

CERTIFICATE OF SERVICE

This Motion is being filed on the date appearing in the header through the ECF system, which will provide electronic copies to counsel of record.

/s/ Michael Kendall
Michael Kendall